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**IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

iBeauty Limited Company, Dongguan
Xianghuo Trading Co., Ltd., Dongguan
Laiyang Trading Co., Ltd., Guangzhou
Linyu Trading Co., Ltd., Guangzhou
Lincan Electronic Technology Co., Ltd.,
and Guangzhou Senran Electronic
Technology Co., Ltd.,

Plaintiffs/Counter-Defendants,

v.

Dbest Products, Inc.,

Defendant/Counterclaimant.

Case No. 2:24-cv-10694-MWC-JC

**PLAINTIFFS/COUNTER-
DEFENDANTS' RESPONSE TO
OSC RE CONSOLIDATION OF
RELATED CASES**

Hon. Judge Michelle Williams Court

Plaintiffs/Counter-Defendants iBeauty Limited Company, Dongguan
Xianghuo Trading Co., Ltd., Dongguan Laiyang Trading Co., Ltd., Guangzhou
Linyu Trading Co., Ltd., Guangzhou Lincan Electronic Technology Co., Ltd., and
Guangzhou Senran Electronic Technology Co., Ltd. hereby submit their response to

1 the Court's Order to Show Cause whether consolidation is proper.
2 Plaintiffs/Counter-Defendants will respond regarding each of the related cases as
3 identified on the docket in turn.
4

5 2:24-cv-10961-MWC-JC: The Plaintiff in the 10961 action is Aborder
6 Products, Inc. None of the involved product ASINs are the same as any of
7 Plaintiffs/Counter-Defendants products. Plaintiffs/Counter-Defendants are not
8 aware of any association with Aborder Products, Inc. or the products this party sells.
9

10 2:25-cv-04573-MWC-JC: The party Dongguan Xianghuo Trading Co., Ltd.
11 is represented by a different counsel, Mr. Yang, in the 04573 action. Counsel for the
12 present case (24-cv-10694) has not been authorized to agree to any consolidation as
13 counsel is not aware of whether Mr. Yang would want to oppose any such
14 consolidation. Therefore, Plaintiffs/Counter-Defendants leave the consolidation of
15 the 04573 action to the Court's sound discretion.
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18 2:25-cv-04586-MWC-JC: Plaintiffs/Counter-Defendants believe the 04586
19 action is proper for consolidation as it relates to the same parties, the same patents,
20 the same ASINs, and the same allegations now being asserted by dbest products, Inc.
21 in the counterclaims.
22

23 2:25-cv-04591-MWC-JC: The Defendant in the 04591 action is Aborder
24 Products, Inc. None of the involved product ASINs are the same as any of
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1 Plaintiffs/Counter-Defendants products. Plaintiffs/Counter-Defendants are not
2 aware of any association with this party or the products this party sells.

3 2:25-cv-04596-MWC-JC: The Defendant in the 04596 action is Shantou
4 Mengxiang Home Furnishings Co., Ltd. None of the involved product ASINs are
5 the same as any of Plaintiffs/Counter-Defendants products. Plaintiffs/Counter-
6 Defendants are not aware of any association with this party or the products this party
7 sells.
8

9
10 2:25-cv-00471-MWC-JC: The Plaintiffs in the 00471 action are Hangzhou
11 Alfa Trading Co LTD and Zhejiang Xinmao Plastic Industry Co. LTD. None of the
12 involved product ASINs are the same as any of Plaintiffs/Counter-Defendants
13 products. Plaintiffs/Counter-Defendants are not aware of any association with these
14 parties or the products these parties sell.
15

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17 2:24-cv-10842-MWC-JC: The Plaintiff in the 10842 action is Taizhou Luqiao
18 Shengqiang Housewares Factory. None of the involved product ASINs are the same
19 as any of Plaintiffs/Counter-Defendants products. Plaintiffs/Counter-Defendants are
20 not aware of any association with this party or the products this party sells.
21

22 2:25-cv-04583-MWC-JC: Plaintiffs/Counter-Defendants believe the 04583
23 action is proper for consolidation as it relates to the same parties, the same patents,
24 the same ASINs, and the same allegations now being asserted by dbest products, Inc.
25 in the counterclaims. As for the Court's recent OSC re Dismissal in the 04583 action,
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1 dbest product, Inc.’s service is woefully deficient. The proof of service identifies
2 that service was executed on a “Liam Ben-David” as the CEO of iBeauty Limited
3 Company. However, Liam Ben-David is the registered agent for iBeauty Brands
4 Inc., which is a California entity and an entirely different entity from iBeauty
5 Limited Company, which is clearly identified as a Colorado entity. Had counsel for
6 dbest products, Inc. attempted to search the public Colorado entity database, he
7 would have easily found iBeauty Limited Company’s registered agent for service of
8 process, namely, Lijun Zheng. Additionally, Counsel for iBeauty Limited Company
9 (Mr. David Silver) spoke with counsel for dbest products, Inc. (Mr. Ehab Samuel)
10 the day before the OSC re Dismissal in the 04583 action was issued. Mr. Samuel
11 informed Mr. Silver that there was no intention of seeking a default given the present
12 OSC re Consolidation, the asserted counterclaims, and the parties’ willingness to
13 consolidate these actions. Furthermore, Plaintiffs/Counter-Defendants will be filing
14 their answer to the counterclaims shortly, if not concurrently herewith, given the
15 prior accepted stipulation for an accelerated answer deadline. Plaintiffs/Counter-
16 Defendants believes this addresses the OSC re Dismissal in the 04583 action as well,
17 and no default should be sought or granted.

23 2:25-cv-02311-MWC-JC: The Plaintiffs in the 02311 action are Wuhan
24 Zhidan Network Technology Co. Ltd. and Wuhan Lanzhi Network Technology Co.
25 Ltd. None of the involved product ASINs are the same as any of Plaintiffs/Counter-
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1 Defendants products. Plaintiffs/Counter-Defendants are not aware of any association
2 with these parties or the products these parties sell.

3 2:25-cv-04587-MWC-JC: The party identified in the complaint is JIEYANG
4 JUXIAONIAN CO., LTD, while the docket and the ASINs in Exhibit C attached to
5 the complaint identifies Guangzhou Linyu Trading Co., Ltd. As the complaints filed
6 by dbest products, Inc. appear to be largely cookie cutter complaints,
7 Plaintiffs/Counter-Defendants believe this complaint was likely misfiled.
8
9 Plaintiffs/Counter-Defendants do not oppose consolidation of allegations made
10 against Guangzhou Linyu Trading Co., Ltd. that match the allegations dbest
11 products, Inc. raises in its counterclaims. However, as the filed complaint
12 misidentifies the parties, Plaintiffs/Counter-Defendants believe it better to have the
13 incorrectly filed complaint dismissed to avoid future confusion.
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17 2:25-cv-04588-MWC-JC: Plaintiffs/Counter-Defendants believe the 04588
18 action is proper for consolidation as it relates to the same parties, the same patents,
19 the same ASINs, and the same allegations now being asserted by dbest products, Inc.
20 in the counterclaims.
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22 2:25-cv-04589-MWC-JC: Plaintiffs/Counter-Defendants believe the 04589
23 action is proper for consolidation as it relates to the same parties, the same patents,
24 the same ASINs, and the same allegations now being asserted by dbest products, Inc.
25 in the counterclaims.
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1 2:25-cv-04623-MWC-JC: The Defendant in the 04623 action is Guangzhou
2 Beidouhuliankeii Company Ltd. Plaintiffs/Counter-Defendants are not aware of any
3 association with this party or the products this party sells.
4

5 2:25-cv-04566-MWC-JC: The Defendants in the 04566 action are
6 Amazon.com, Inc. and Amazon.com Services LLC. Plaintiffs/Counter-Defendants
7 believe that dbest products, Inc. is using this complaint to leverage Amazon to
8 remove Plaintiffs/Counter-Defendants' products without the need of seeking any
9 injunctive orders from the Court. At the very least, the 04566 action includes ASIN
10 B0CHRN2YF, which matches one of the ASINs for iBeauty Limited Company.
11 To the extent dbest products, Inc. is attempting to impact the rights of
12 Plaintiffs/Counter-Defendants in this action (24-cv-10694), Plaintiffs/Counter-
13 Defendants believe the 04566 action would be proper for consolidation to a severed
14 portion of the 04566 action as it relates to Plaintiffs/Counter-Defendants or their
15 products, such as ASIN B0CHRN2YF.
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19 2:25-cv-04614-MWC-JC: The Defendant in the 04614 action is Hangzhou
20 Alfa Trading Company, Ltd. Plaintiffs/Counter-Defendants are not aware of any
21 association with this party or the products this party sells.
22

23 2:25-cv-04606-MWC-JC: The Defendant in the 04606 action is Zhejiang
24 Xinmao Plastic Industry Company, Ltd. Plaintiffs/Counter-Defendants are not
25 aware of any association with this party or the products this party sells.
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1 Generally, Plaintiffs/Counter-Defendants do not oppose the consolidation of
2 cases relating to them as defendants with this present matter. However,
3 Plaintiffs/Counter-Defendants believe consolidating this matter with the identified
4 related cases involving additional parties, even if involving similar patent
5 infringement allegations, would only lead to frustration of the current matter.
6

7 As it currently stands, there are multiple Plaintiffs/Counter-Defendants, each
8 with their own products. While there might be some cross-over with some of the
9 products, there are multiple distinct products at issue. Adding different parties with
10 different products will require a separate analysis for each additional party and
11 product. Consolidation of such cases will only compound the amount of different
12 analyses and could potentially cause a confusion or improper conflation of different
13 products. Where the parties and products are different, the case should have its own
14 separate determination and should not be consolidated.
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18 In short, Plaintiffs/Counter-Defendants believe consolidation of the below
19 cases would be proper:
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21 2:25-cv-04586-MWC-JC

22 2:25-cv-04583-MWC-JC (and no default against iBeauty Limited Company
23 should be sought or entered)
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25 2:25-cv-04588-MWC-JC

26 2:25-cv-04589-MWC-JC
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1 2:25-cv-04566-MWC-JC (solely for allegations relating to Plaintiffs/Counter-
2 Defendants or their products, such as ASIN B0CHRNM2YF)

3 2:25-cv-04587-MWC-JC should be dismissed as the filing named the
4 incorrect party and consolidating the complaint may cause confusion.
5

6 Given the representation of different counsel in the 2:25-cv-04573-MWC-JC
7 action, Plaintiffs/Counter-Defendants leave the matter of consolidation to the
8 Court's sound discretion.
9

10 Plaintiffs/Counter-Defendants do not believe the consolidation of any of the
11 remaining identified related cases to be proper.
12

13 DATED: July 25, 2025

Respectfully submitted,

14 /s/ David Silver

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CERTIFICATE OF SERVICE

I, David Silver, hereby certify that on July 25, 2025, I electronically filed the foregoing with the Court using the CM/ECF system, and thereby delivered the foregoing by electronic means to all counsel of record.

/s/ David Silver
David Silver (CA Bar No. 312445)
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